

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

IN RE: ) NO: 12-48877-659  
 ) CHAPTER 13  
Mark Golliday, ) Hearing Date: 4/30/15  
 ) Hearing Time: 11:00 a.m.  
Debtor. ) Courtroom: 7 North

TRUSTEE'S OBJECTION TO THIRD AMENDED CHAPTER 13 PLAN

Comes now John V. LaBarge, Jr., Standing Chapter 13 Trustee,  
and states as follows:

1. The third amended plan is not feasible in that:

a) It will not quite fully pay the 100% guarantee to non-priority  
unsecured creditors. [It will pay 96%.]

b) \*Debtor has several pending objections to claims which,  
depending on the outcomes, may or may not render the third  
amended plan feasible.

**WHEREFORE**, the Trustee prays that the Court deny confirmation of  
Debtor's Third Amended Chapter 13 Plan; and for such other relief  
as this Honorable Court deems necessary and just under the  
circumstances.

Respectfully Submitted,

/s/ Joseph M. Wilson  
John V. LaBarge, Jr.  
Chapter 13 Trustee  
Joseph M. Wilson  
FED#51849MO; MO#51849  
Attorney For Trustee

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St. Louis, MO 63143  
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above Trustee's Objection was served this 13th day of April 2015, electronically via CM/ECF or by depositing same in the U.S. mail, postage pre-paid, addressed to:

/s/ Joseph M. Wilson

The Powderly Law Firm, LLC  
11965 St. Charles Rock Rd., Suite 202  
Bridgeton, MO 63044

Mark Golliday  
2044 Graystone Dr.  
St. Charles, MO 63303